

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

93-RF-3118

Attn: R. H. Birk

The Interagency Agreement (IAG) schedule for Operable Unit No. 3 (OU 3) includes the Draft RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Report due on July 16, 1993 and the Final RFI/RI Report due on December 13, 1993. At the current work progress, it is anticipated that these milestones cannot be met.

Delays in the IAG schedule have occurred over Fiscal Year (FY) 92/93. Extensions to OU 3 milestones are required due to the following schedule impacts:

EPA and CDH approval of the Final Work Plan was delayed from January 14, 1992 to March 17, 1992 which delayed start of field work. This delay resulted from a third review and comment period required by the regulatory agencies before granting document approval.

FY92 budget uncertainty at the beginning of the fiscal year further delayed procurement of a field work subcontractor.

Delays in obtaining a NEPA-required Categorical Exclusion for sampling delayed the start of field work. Direction from DOE to start field work activities outside of the floodplains was not received until May 15, 1992.

Several field work activities were delayed due to the potential presence of the threatened plant species, *Spiranthes diluvialis*. Soil trench sampling and installation of groundwater wells which were originally scheduled for the spring of 1992 could not start until after an August/September survey to verify the absence of *Spiranthes* from the study area.

The IAG schedule includes 21 days for obtaining permits to conduct the offsite field work. This time period is grossly inadequate to complete the task. Field work has been interrupted several times due to lack of necessary access agreements with the landowners. Agreements have often been difficult to obtain due to owners concerns over potential impacts from RFP, uncertainty in the investigation results, and liability issues. Twenty landowners have refused to allow access, thus requiring the relocation of the affected sample sites.

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostried 220
DATE 5-19-93

A-DU03-000123

DIST.	LIR	ENG
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HILBIG, J.G.		
DEKER, E.H.		
KERSH, J.M.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
REILEY, J.H.		
SANDLIN, N.B.		
SHEPHERD, R.I.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, E.D.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		
Benedetti, R.I.	X	
Smith, T.A.		
William, M.	X	
Arndt, M.B.	X	
CORRES CONTROL	X	X
Admin. Rec.	X	
ERM Track 2		

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
SIGNATURE
DOCUMENT CLASSIFICATION
~~REVIEW WAIVER PER~~
~~CLASSIFICATION OFFICE~~

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS
☐ OPEN ☐ CLOSED
☐ PARTIAL

LTR APPROVALS:
MBA: *[Signature]*
ORIG & TYPIST INITIALS

ORIG & TYPIST INITIALS

MC 11

AF 46469 (Rev. 9-92)

Richard J. Schassburger
March 12, 1993
93-RF-3118
Page 2

Weather delays have impacted the field work schedule to complete collection of surface soil samples. The collection of surface soil samples has been limited by the unusually persistent winter snow cover. Soil sampling has not been possible for 12 of the last 15 weeks. The internal completion date for this activity as reported in the FY93 Work Package was February 26, 1993. This completion date was not achieved and has been extended to March 31, 1993. Weather should improve during March to allow achievement of this internal milestone.

Although not currently impacting the schedule, the recent ban on field work within a mile radius of the recently identified bald eagles nest may cause schedule delays for planned spring activities. The schedule effect will be known following consultation with the United States Fish and Wildlife Service (USFWS) on the impact of the planned activities on the eagles.

The potential for missed OU 3 milestones has been discussed at various times with Bob Birk of your staff, EPA and CDH Project Managers, and was also discussed at the recent DOE/RFO and DOE/HQ FY93 work package presentations.

The extension period is expected to be six months long. The exact extension period will best be determined after the lab analysis/data validation turnaround time has been accurately determined following the completion of surface soil sampling, and the effect of the bald eagles has been determined following consultation with the USFWS.

The original IAG scheduled 416 days from Work Plan approval to submittal of the Draft RFI/RI Report for field work. If 416 days are counted from the actual agency approval date, the submittal date for the Draft RFI/RI Report would be approximately October 13, 1993. This calculation exercise indicates the reasonableness of a schedule extension. The accumulated impacts to the OU 3 schedule will extend the delivery of the draft RFI/RI Report to the Agencies to December 1993.

If you have any questions concerning this issue, please call M. Guillaume of Remediation Project Management at extension 8557.



M. B. Arndt
Director
ERM/Remediation Project Management

MG:dmf

Orig. and 1 cc - R. J. Schassburger